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CHEVRON CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATTO IYELA GBARABE, et al.,

Plaintiffs,

v.

CHEVRON CORPORATION,

Defendant.

Case No. 14-cv-00173-SI

**~~[PROPOSED]~~ ORDER RE: CERTAIN
DISCOVERY AND CLASS
CERTIFICATION MATTERS AND
CONTINUING THE CASE
MANAGEMENT CONFERENCE TO
JUNE 3, 2016**

This Court, having considered parties Stipulation Re: Certain Discovery and Class Certification Matters and Continuing the Case Management Conference to June 3, 2016 (Dkt. No.), and finding good cause exists, orders as follows:

1. The page limit for Chevron's opposition brief shall be commensurate with plaintiff's motion, i.e., 41 pages. Any other submissions, including Daubert or other motions, shall adhere to the page limits in the Local Rules. Plaintiff shall adhere to the Local Rules in all future briefing, absent an agreement and permission of the Court. Chevron reserves all rights to object or seek other relief for other defects in plaintiff's motion, supporting papers and expert reports; plaintiff reserves all right to assert the motion, supporting papers and expert reports are Rule 26 compliant.

2. By April 30, 2016, plaintiff shall provide additional source materials and cure any

defects in their expert reports to ensure that the reports comply with Federal Rule of Civil Procedure 26(a)(2)(B), without changing the substance of those reports. This includes providing to Chevron the complete facts and data considered by plaintiff's experts in forming their opinions. To the extent that Chevron asserts any report fails to comply with Rule 26(a)(2)(B) after April 30, at Chevron's election, Chevron can address any remaining deficiencies in its submission in opposition to the class certification motion. Alternatively, it can initiate a meet-and-confer between the parties and seek to have plaintiff withdraw all or part of a report, with any remaining disputes that the parties cannot resolve referred to the Court for determination.

3. The dates for class certification shall be re-set as follows:

Class Certification Opposition Brief: August 12, 2016;

Class Certification Reply Brief: October 14, 2016; and

Hearing: December 2, 2016.

4. The parties shall not engage in speaking objections at the depositions and shall limit themselves to succinctly stated objections to the form of the question. This means that the parties shall not to make argumentative objections or objections that suggest in any way how the witness should respond or say "If you know" between a question and answer. Nothing in this stipulation prohibits instructions not to answer where permitted by law.

5. The parties shall continue to discuss multi-track depositions of percipient witnesses and putative class members in Nigeria and attempt to reach agreement.

6. The Case Management Conference scheduled for April 22, 2016 is continued until June ²~~3~~, 2016.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 18, 2016

NAI-1500565980v1



The Honorable Susan Y. Illston